

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

**CHRIS RECTOR and
MICHELLE RECTOR**

PLAINTIFFS

v.

Case No. 4:20-cv-1025-KGB

**MARTIN “SONNY” CLIFFORD,
individually and in his official capacity as
Van Buren County Sheriff’s Deputy,
LUCAS EMBERTON, KIM MONGOLD,
CRYSTAL GARNER, VAN BUREN
COUNTY VETERINARY CLINIC, INC.,
and CITY OF HEBER SPRINGS**

DEFENDANTS

ORDER

Before the Court is separate defendants Martin “Sonny” Clifford, in his individual capacity, and Kim Mongold’s motion for agreed protective order (Dkt. No. 41). Mr. Clifford and Ms. Mongold state that they have sought discovery of therapy records from Conway Counseling & Wellness, PLLC (“the Center”) via the use of plaintiffs Chris Rector and Michelle Rector’s signed authorization (*Id.*, ¶ 1). Mr. Clifford and Ms. Mongold further state that, due to the confidential nature of the requested documents, they have collaborated with the Center and agreed to the attached protective order (*Id.*, ¶ 2). For good cause shown, the Court enters the proposed agreed protective order. *See* Court’s Exhibit A.

So ordered this the 30th day of November, 2021.



Kristine G. Baker
United States District Judge

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

CHRIS RECTOR and MICHELLE RECTOR

PLAINTIFFS

VS.

CASE NO. 4:20-CV-1025KGB

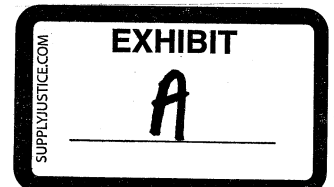
**MARTIN "SONNY" CLIFFORD, INDIVIDUALLY
AND IN HIS CAPACITY AS VAN
BUREN COUNTY SHERIFF'S DEPUTY,
LUCAS EMBERSON, KIM MONGOLD,
TONY SMITH, AND LITTLE ROCK K-9
ACADEMY**

DEFENDANTS

AGREED PROTECTIVE ORDER

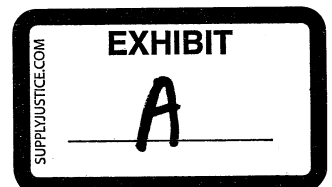
Defendants, Martin "Sonny" Clifford, in his individual capacity, and Kim Mongold (hereinafter collectively referred to as "Defendants"), have sought copies of certain documents from Conway Counseling & Wellness Center PLLC, (hereinafter referred to as "the Center"), some of which contain information that is confidential in nature. Accordingly, the Defendants and the Center have agreed to this Protective Order and further agree that these documents will be produced under the terms stated herein.

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the following terms govern the disclosure and use of documents and all information contained therein produced by the Center and its attorneys in connection with the above-captioned litigation that may contain personal identifying information, personal health information and financial information of the plaintiffs, Chris and Michelle Rector, and personal identifying information, personal health information and



financial information of individual persons other than the plaintiffs, which are hereinafter referred to collectively as the "Confidential Documents."

1. Confidential Documents shall be used for purposes of this individual case only and for no other purpose whatsoever.
2. Confidential Documents shall not be disclosed to any person other than counsel for the parties and for the Center and their employees actively engaged in the conduct of this litigation, witnesses in this case who will be deposed or testify at trial, and experts/consultants retained for the purpose of assisting counsel in trial preparation of this particular matter.
3. All testimony addressing the Confidential Documents shall be subject to this order. Court reporters shall be instructed to mark transcripts "Confidential – Subject to Protective Order" on the face of the transcript in any deposition where the Confidential Documents are referenced or attached as exhibits.
4. The provisions of this Order shall survive the final termination of this action.
5. If Defendants wish to use any of the documents or information in any affidavits, motions, briefs, letters or other papers filed with the Clerk of the Court, the Confidential Documents and reference to their contents shall be filed and maintained under seal.
6. Confidential Documents may be sent under separate cover to the Court for in camera review, along with any motions or other pleadings that the Court may consider, so long as the Court is advised of the confidential nature of the documents and this Order.



7. This Order may be modified by written agreement of all parties.

IT IS SO ORDERED.

Kristine M. Baker
HONORABLE KRISTINE G. BAKER, JUDGE

November 29, 2021
DATE

AGREED TO:

Counsel for Conway Counseling & Wellness Center, PLLC:

[Signature]
Gary Jiles, Esq.

Counsel for Martin "Sonny" Clifford, in his individual
Capacity, and Kim Mongold

[Signature]
Jamie H. Jones, Esq.

